

REMARKS

Applicant has reviewed carefully the pending Office Action, and the applied art of van Hoff et al., Conkwright et al., and Herz et al. In light of this review, Applicant respectfully traverses.

More specifically, as noted in the Office Action, van Hoff et al. fail to disclose a correlation module for correlating and gathering information with available data content to produce a set of content corresponding to information gathered about a person and stored within a protective zone located within the end user's computer. However, Conkwright et al. fails to bridge the gap between the claimed subject matter and van Hoff et al. Specifically, nothing in Conkwright et al. discloses a device to gather information about the end user and correlate the gathered and stored information to direct content to the end user's computer. Yet this is the explicit subject matter of Claim 1 as well as Claims 14 and 27. More particularly, Applicant's invention as claimed gathers information about a person and stores it in a protective zone located on the end user's computer. The correlation module correlates this stored information to direct content to the end user's computer. The proposed combination of van Hoff et al. and Conkwright et al, alone and further with Herz et al. fails to provide such a system. All applied publications fail to disclose such a device and process for gathering and locally storing information and for using such information to direct content to the end user's computer.

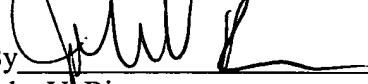
Moreover, there is no motivation in these references that would impel one of ordinary skill in the art to make such a combination. Applicant respectfully submits that the proposed motivation is offered only in an attempt to avoid having the present rejection being deemed a prima facie case of hindsight reconstruction.

For the above reasons, Applicant respectfully requests allowance of all claims.

Applicant believes a fee is due with this response. Please charge our Deposit Account No. 18-1945, under Order No. SIMU-P01-003 from which the undersigned is authorized to draw.

Dated: January 27, 2005

Respectfully submitted,

By 

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